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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

HAKAN YUCESoy, ABDI MAHAMMED,  
MOKHTAR TALHA, BRIAN MORRIS, and  
PEDRO SANCHEZ, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC., TRAVIS  
KALANICK, and RYAN GRAVES,

Defendants.

CASE NO. 3:15-cv-00262-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING HEARING SCHEDULE FOR  
CASE MANAGEMENT CONFERENCE,  
DEFENDANTS' MOTION TO COMPEL  
ARBITRATION, AND DEFENDANTS'  
MOTION TO DISMISS**

**STIPULATION**

Plaintiffs Hakan Yucesoy, Abdi Mahammed, Mohktar Talha, Brian Morris, and Pedro Sanchez (“Plaintiffs”) and Defendants Uber Technologies, Inc., Travis Kalanick, and Ryan Graves (“Uber”) (collectively, the “Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on August 5, 2015, Defendants filed a motion to compel arbitration as to certain of the named plaintiffs, *see* Dkt. No. 94;

WHEREAS, the hearing for Defendants’ motion to compel arbitration is currently scheduled for October 21, 2015 at 9:30 a.m.;

WHEREAS, on August 28, 2015, Defendants filed a motion to dismiss Plaintiffs’ second amended complaint, *see* Dkt. No. 109;

WHEREAS, the hearing for Defendants’ motion to dismiss Plaintiffs’ second amended complaint is currently scheduled for October 21, 2015 at 9:30 a.m.;

WHEREAS, the Court has scheduled a case management conference for November 19, 2015 at 10:30 a.m.;

WHEREAS, counsel for Plaintiffs represents the named plaintiffs in *O’Connor v. Uber Technologies, Inc.*, No. 13-03826-EMC (“*O’Connor*”) and counsel for Defendants represents the defendant in *O’Connor*;

WHEREAS, the Court has scheduled a case management conference in *O’Connor* for October 21, 2015 at 9:30 a.m.;

WHEREAS, on September 10, 2015, the *O’Connor* defendant filed a motion to compel arbitration as to certain absent class members in *O’Connor*, *see* *O’Connor* Dkt. No. 346;

WHEREAS, the hearing for the *O’Connor* defendant’s motion to compel arbitration as to certain absent class members is currently scheduled for October 21, 2015 at 9:30 a.m.;

WHEREAS, on October 1, 2015, the *O’Connor* plaintiffs filed a motion for leave to file a fourth amended complaint in *O’Connor*, *see* *O’Connor* Dkt. 355;

WHEREAS, the hearing for the *O’Connor* plaintiffs’ motion for leave to file a fourth amended complaint is currently scheduled for November 19, 2015 at 1:30 p.m.;

WHEREAS, certain unavoidable scheduling conflicts have arisen for certain of the parties' counsel on October 21, 2015 and November 19, 2015;

WHEREAS, certain of the parties' counsel will be traveling to San Francisco from Los Angeles and Boston for the aforementioned hearings;

WHEREAS, the Court is unavailable on the following Civil Law and Motion hearing dates: October 22, 2015; November 5, 2015; November 12, 2015; and November 26, 2015;

WHEREAS, the *O'Connor* parties intend to file a stipulation and proposed order requesting that the *O'Connor* parties' case management conference, the *O'Connor* defendant's motion to compel arbitration as to certain unnamed class members, and the *O'Connor* plaintiffs' motion for leave to file a fourth amended complaint be scheduled for November 4, 2015 at 1:30 p.m.;

WHEREAS, to accommodate the aforementioned scheduling conflicts and conserve the resources of the Court and the parties, the parties have conferred and agreed that: (1) the hearing for Defendants' motion to compel arbitration as certain named plaintiffs in this case; (2) the hearing for Defendants' motion to dismiss Plaintiffs' second amended complaint; and (3) the case management conference in this case should be rescheduled for November 4, 2015 at 1:30 p.m., to coincide with the proposed hearing date regarding the case management conference in *O'Connor*, the defendants' motion to compel arbitration in *O'Connor*, and the plaintiffs' motion for leave to file a fourth amended complaint in *O'Connor*;

NOW THEREFORE, the parties hereby stipulate, subject to the approval of this Court, that the hearing date for (1) Defendants' motion to compel arbitration as certain named plaintiffs, (2) Defendants' motion to dismiss Plaintiffs' second amended complaint, and (3) the case management conference shall be scheduled for November 4, 2015 at <sup>10:00 am</sup>~~1:30 p.m.~~; and (4) the parties' case management statement shall be due October 28, 2015.

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1 **IT IS SO STIPULATED**

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3 Dated: October 12, 2015

GIBSON, DUNN & CRUTCHER LLP

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5 By: /s/ Theodore J. Boutrous Jr.  
Theodore J. Boutrous Jr.

6 Attorneys for Defendants UBER  
7 TECHNOLOGIES, INC., TRAVIS KALANICK,  
8 and AND RYAN GRAVES

9 Dated: October 12, 2015

LICHTEN & LISS-RIORDAN, P.C.

10  
11 By: /s/ Shannon Liss-Riordan  
12 Shannon Liss-Riordan

13 Attorney for Plaintiffs HAKAN YUCESOIY, ABDI  
14 MAHAMMED, MOKHTAR TALHA, BRIAN  
15 MORRIS, and PEDRO SANCHEZ

16  
17 ~~**PROPOSED**~~ ORDER

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

19 The hearing date is set for November 4, 2015 at 10:00 a.m.

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21 Dated: 10/13, 2015



22 The Honorable Edward M. Chen  
23 United States District Judge  
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